

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

In the Matter of

Expanded Interconnection with
Local Telephone Company Facilities

)
)
)
)

92-2221

CC Docket No. 91-141

best means of reaching that end. Sprint believes that density zone pricing, properly implemented, should reduce the LECs' incentive to offer uneconomic volume discounts that they might otherwise feel impelled to offer, in a system of geographically averaged pricing, in order to meet the competition of new entrants in high-volume, low-cost areas. For this reason, Sprint believes that density zone pricing should be implemented as soon as possible. Sprint also opposes a delay in final action on the reallocation of GSF costs in CC Docket No. 92-222. Special

access and switched transport are both overburdened by the

submissions by interested parties, before deciding whether to permit the volume and term discounts to become effective.

Respectfully submitted,

SPRINT COMMUNICATIONS CO.

A handwritten signature in dark ink, appearing to read "Leon M. Kestenbaum", is written over a horizontal line.

Leon M. Kestenbaum
H. Richard Juhnke
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
(202) 828-7437

April 7, 1993

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Partial Opposition of Sprint to MFS Emergency Petition" of Sprint Communications Co. was sent via first class mail, postage prepaid, on this the 7th day of April, 1993, to the below-listed parties:

Cheryl A. Tritt*
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., #500
Washington, D.C. 20554

Melissa Newman*
Policy & Program Planning Div.
Federal Communications Commission
1919 M Street, N.W., #544
Washington, D.C. 20554

Kathleen Abernathy*
Legal Advisor
Federal Communications Commission
1919 M Street, N.W., #814
Washington, D.C. 20554

Jim Schlichting, Chief*
Policy & Program Planning Div.
Federal Communications Commission
1919 M Street, N.W., #544
Washington, D.C. 20554

Doug Slotten*
Policy & Program Planning Div.
Federal Communications Commission
1919 M Street, N.W., #544
Washington, D.C. 20554

Linda Oliver*
Legal Advisor
Federal Communications Commission
1919 M Street, N.W., #832
Washington, D.C. 20554

Jay C. Keithley
United Telephone Companies
1850 M Street, N.W.
Suite 1100
Washington, D.C. 20036

W. Richard Morris
United Telephone Companies
P. O. Box 11315
Kansas City, MO 64112

Joseph W. Miller
WilTel, Inc.
Suite 3600
P.O. Box 2400
One Williams Center
Tulsa, Oklahoma 74102

Francine J. Berry
R. Steven Davis
Roy E. Hoffinger
American Telephone & Telegraph
Company
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Richard McKenna HQE03J36
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Michael D. Lowe
Lawrence W. Katz
James R. Young
The Bell Atlantic Telephone
Companies
1710 H Street, N.W.
Washington, D.C. 20006

James E. Taylor
Richard C. Hartgrove
Michael J. Zpevak
Southwestern Bell Telephone
Company
1010 Pine Street, Room 2114
St. Louis, MO 63101

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, N.W.
Washington, D.C. 20007
Attorneys for MFS Communications
Company, Inc.

Patrick A. Lee
Edward E. Niehoff
New York Telephone Company and
New England Telephone &
Telegraph Company
120 Bloomingdale Road
White Plains, NY 10605

Marc E. Manly
American Telephone & Telegraph
Company
1722 Eye Street, N.W.
Washington, D.C. 20006

Herbert E. Marks
David Alan Nall
Radhika V. Karmarkar
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044
Attorneys for The Independent Data
Manufacturers Association, Inc.

Andrew L. Regitsky
Senior Manager
MCI Telecommunications Corp.
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Floyd S. Keene
Mark R. Ortlieb
Attorneys for the Ameritech
Operating Companies
2000 W. Ameritech Center Drive
Room 4H84
Hoffman Estates, IL 60196-1025

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036

James P. Tuthill
Jeffrey B. Thomas
Pacific Bell and Nevada Bell
140 New Montgomery Street
Room 1522-A
San Francisco, CA 94105

Kathryn Marie Krause
U S West Communications, Inc.
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

William D. Baskett III
Thomas E. Taylor
David S. Bence
Christopher J. Wilson
Frost & Jacobs
2500 Central Trust Center
201 East Fifth Street
Cincinnati, OH 45202
Attorneys for Cincinnati Bell
Telephone Company

Josephine S. Trubek
General Counsel
Rochester Telephone Corporation
180 South Clinton Avenue
Rochester, NY 14646

Darrell S. Townsley
Special Assistant Attorney General
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Lawrence P. Keller
Cathey, Hutton & Assoc., Inc.
3300 Holcomb Bridge Road
Suite 286
Norcross, GA 30092

William J. Cowan
General Counsel
New York State Department of
Public Service
Three Empire State Plaza
Albany, NY 12223

James L. Wurtz
Pacific Bell and Nevada Bell
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

David Cosson
L. Marie Guillory
National Telephone Cooperative
Association
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Roy L. Morris
Deputy General Counsel
Allnet Communication Services,
Inc.
1990 M Street, N.W.
Suite 500
Washington, D.C. 20036

Daryl L. Avery
Peter G. Wolfe
Public Service Commission of the
District of Columbia
450 Fifth Street, N.W.
Washington, D.C. 20001

Margot Smiley Humphrey
Koteen & Naftalin
Suite 1000
1150 Connecticut Ave., N.W.
Washington, D.C. 20036
Attorney for TDS Telecommunica-
tions Corporation; National
Rural Telecom Association

Lisa M. Zaina
Matthew L. Dosch
OPASTCO
21 Dupont Circle, N.W.
Suite 700
Washington, D.C. 20036

Paul J. Berman
Covington & Burling
1201 Pennsylvania Ave., N.W.
Post Office Box 7566
Washington, D.C. 20044
Attorney for Puerto Rico Telephone
Company

Stuart Dolgin
Assistant General Counsel
Personal Communications Network
Services of N.Y., Inc., d/b/a
a PCN-One of N.Y., & PCNS-One
of N.Y.
17 Battery Place, Suite 1200
New York, NY 10004-1256

E. William Kobernusz
Vice President-Regulatory
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06510-1806

Theodore D. Frank
Vonya B. McCann
Arent, Fox, Kintner, Plotkin
& Kahn
1050 Connecticut Ave., N.W.
Washington, D.C. 20036-5339
Attorneys for Central Telephone
Company

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004
Attorneys for Williams
Telecommunications Group, Inc.

William E. Taylor
National Economic Research
Associates, Inc.

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
One Thomas Circle, N.W.
Suite 800
Washington, D.C. 20005
Attorney for The Lincoln Telephone
& Telegraph Company

Carol F. Sulkes
Acting Vice President-Regulatory
Policy
Central Telephone Company
8745 Higgins Road
Chicago, IL 60631

Richard A. Askoff
National Exchange Carrier
Association, Inc.
100 South Jefferson Road
Whippany, NJ 07981

Robert C. Atkinson
Senior Vice President
Regulatory & External Affairs
Teleport Communications Group
One Teleport Drive
Suite 300
Staten, Island, NY 10311

Barbara L. Samson
Chairman of the Board of Directors
Association for Local Telecommuni-

Michael L. Glaser
Thomas F. Dixon
Holme Roberts & Owen
1700 Lincoln, Suite 4100
Denver, Colorado 80203
Attorneys for Teleport Denver,
Ltd.

Daniel O. Coy
President, CEO
Metrocomm Fiber Optic Network
50 West Broad Street
Columbus, OH 43215

Eric Fishman
Sullivan & Worcester
1025 Connecticut Ave., N.W.
Washington, D.C. 20036
Attorney for RCI Long Distance
of New England, Inc., d/b/a
Long Distance North

John F. Sturm
Senior Vice President
Government, Legal and Policy
Newspaper Association of America
11600 Sunrise Valley Drive
Reston, VA 22091

Robert C. MacKichan, Jr.
Vincent L. Crivella
Michael J. Ettner
General Services Administration
18th & F Streets, N.W.
Room 4002
Washington, D.C. 20405

Edward C. Addison, Director
Division of Communications
Virginia State Corporation
Commission Staff
P.O. Box 1197
Richmond, VA 23209

Peter Arth, Jr.
Edward W. O'Neill

Randall B. Lowe
John E. Hoover
Charles H.N. Kallenbach
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20005-2088
Attorneys for Penn Access Corp.

Jeffrey J. Milton
President
Institutional Communications
Company
1410 Spring Hill Rd., #300
McLean, VA 22102-3002

Joe D. Edge
Hopkins & Sutter
888 16th Street, N.W.
Washington, D.C. 20006
Attorney for General Communication
Inc.

Martin E. Freidel
Vice President
MidAmerican Communications
Corporation
7100 W. Center Road
Suite 300
Omaha, NE 68106-2723

John P. Kelliher
Solicitor
Illinois Commerce Commission
180 North LaSalle Street
Suite 810
Chicago, IL 60601

William E. Wyrrough, Jr.
Associate General Counsel
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Fla. 32399-0850

Mark S. Hayward
Barry Pineles

Irwin A. Popowsky
Philip F. McClelland
Pennsylvania Office of Consumer
Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Shirley S. Fujimoto
Christine M. Gill
Brian T. Ashby
Keller & Heckman
1001 G Street, N.W.
Washington, D.C. 20005
Attorneys for Wells Rural
Electric Company

Brian R. Moir
Fisher, Wayland, Cooper & Leader
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037-1170
Attorney for International
Communications Association

Richard E. Wiley
Michael Yourshaw
William B. Baker
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Robin Pischel Ancona
Marilyn Moore
Michigan Public Service
Commission Staff
6545 Mercantile Way
P.O. Box 30221
Lansing, Michigan 48909

Thomas J. Casey
Ronald W. Gavillet
James M. Fink
Skadden, Arps, Slate, Meagher
& Flom
1440 New York Ave., N.W.
Washington, D.C. 20005
Attorneys for FMR Corp.

W. Terry Maguire
Claudia M. James
American Newspaper Publishers
Association
Dulles Airport
P.O. Box 17407
Washington, D.C. 20004

Debra L. Lagapa
Ellen G. Block
Cathleen A. Massey
Morrison & Foerster
2000 Pennsylvania Ave., N.W.
Suite 5500

Randolph J. May
Richard S. Whitt
Sutherland, Asbill & Brennan
1275 Pennsylvania Ave., N.W.

Compuserve Incorporated
5000 Arlington Centre Blvd.
P. O. Box 20212
Columbus, OH 43220

Andrew D. Lipman
Jonathan E. Canis
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Attorneys for Local Area
Telecommunications, Inc.

Joseph C. Harkins, Jr.
Chairman
Penn Access Corporation
Centre City Tower
650 Smithfield Street
Pittsburgh, PA 15222-3907


Christine Jackson

April 7, 1993

*BY HAND